

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

\* \* \*

EUFEMIA GUILLEN, )  
vs. Plaintiff, )  
B.J.C.R. L.L.C., a Nevada Limited Liability )  
Company; B.J.H.S., LLC., a Nevada Limited )  
Liability Company; R.C.S.J., LLC, a Nevada )  
Limited Liability Company; Dhilan One L.L.C., a )  
Nevada Limited Liability Company; CHAMPAK )  
LAL, an Individual; and BHARAT B. LAL, an )  
Individual, )  
Defendants. )  
)

) Case No.: 3:20-cv-00317-ART-CSD  
)  
)

) ORDER GRANTING  
)  
)

) **STIPULATION TO EXTEND**  
TIME TO FILE PROPOSED  
**JOINT PRE-TRIAL ORDER**  
)  
)

) (FIRST REQUEST)  
)

Pursuant to LR IA 6-1 and LR 26-3, Defendants and Plaintiff Eufemia Guillen (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to extend time for the parties to file their proposed Joint Pre-Trial Order from the current deadline of July 1, 2024 through and including **August 1, 2024**. This is the first request for an extension of this specific deadline. The requested

1 extension is sought in good faith and not for purposes of undue delay. The reasons for the extension  
2 are as follows:

3 1. Plaintiff's counsel, JAMES P. KEMP, ESQ., has been having to care for his sister who has  
4 been hospitalized for most of the past two months for a series of treatments for a potentially  
5 terminal illness and complications that have arisen out of that illness. He is her only family  
6 and support in Las Vegas to help in her care.

7 2. Plaintiff's counsel, BARBARA W. GALLAGHER, ESQ., has been preparing for and  
8 conducting a trial in Portland, Oregon that just recently was concluded in June, 2024.

9 3. As result of the above scheduling conflicts Plaintiff's counsel has not had time to address the  
10 issues and complete a draft of the proposed Joint Pre-Trial Order.

11 4. The Parties believe that an additional month should provide enough time to complete and  
12 file the proposed Joint Pre-Trial Order.

13

14 Accordingly, additional time is needed and the parties request that the court grant this extension.

15 IT IS SO STIPULATED.

16 Dated this 30<sup>th</sup> day of June 2024.

17 KEMP & KEMP

18 /s/ James P. Kemp  
19 James P. Kemp, Esq.  
20 Barbara W. Gallagher, Esq.

21 *Attorneys for Plaintiff*

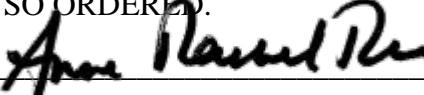
22 Dated this 30<sup>th</sup> day of June 2024.

23 SIMONS HALL JOHNSTON PC

24 /s/Sandra C. Ketner  
25 Anthony L. Hall, Esq.  
26 Sandra C. Ketner, Esq.

27 *Attorneys for Defendants*

28 IT IS SO ORDERED.

  
29 Anne R. Traum  
30 United States District Judge  
31  
32 Dated: July 2, 2024